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VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Consolidated Docket Nos.: 2017-207-E; 2017-305-E; and 2017-370-E

Dear Ms. Boyd:

On April 1, 2020, Dominion Energy South Carolina, Inc. ("DESC") filed a letter with the Public Service Commission of South Carolina ("Commission") in which DESC made a number of requests.

Regarding DESC's request to delay the effective date of new rates to March 8, 2021, a delay may be appropriate due to the time constraints that exist during a rate case, coupled with the uncertain impacts of Covid-19 in the upcoming months. In light of these unusual circumstances, ORS respectfully requests that DESC file its direct testimony commensurate with the filing of its Application.¹ The Company's most recent general rate case utilized a 2011 test year which is more than eight years ago, and ORS anticipates the review of the upcoming general rate case will be detailed and lengthy. The added time between the Company's filed direct and any direct testimony of the ORS and intervenors allows for discovery to be conducted more thoroughly and all positions to be thoughtfully vetted and discussed between the parties. This in turn leads to a more complete case being presented to the Commission and increases the likelihood that a stipulation of issues or settlement discussions can be fully explored. Having DESC file direct testimony commensurate with the filing of its Application is in the public interest.

¹ The Company stated that it may file its rate case Application as late as August 15, 2020. See Letter filed April 1, 2020, p. 3.

Also, ORS does not oppose the Company's request to update, for known and measurable amounts, test period figures as of November 30, 2020. However, as stated in *Parker v. South Carolina Public Service Com'n*, 280 S.C. 310, 312, "[e]ssential to the success of [using a test year formula] is the establishment of a 'cut-off' date." Therefore, absent a request otherwise, ORS respectfully requests that the Company be prevented from providing test-year updates subsequent to November 2020, with the exception of adjustments for any known and measurable out-of-period changes in expenses, revenues and investments that would materially alter the rate base. *See Id.* It is reasonable to create a test year time limitation to create finality. Additionally, this would be beneficial to all parties because it would enable each party to concentrate their efforts on analyzing fixed, rather than shifting, values. If the Company has the ability to update test year values at will, it would create a shifting of values that ORS and the intervenors must evaluate, create unnecessary complications, confuse communications, and impede parties' ability to properly analyze all aspects of the case. As a result, ORS believes that certainty on the front end will lead to a better product on the back end and respectfully requests that the Commission prohibit DESC from adjusting test-year data subsequent to its requested November 2020 test-period update.

Sincerely,

s/ Jeff Nelson

Jeffrey M. Nelson

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)